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FILED
3/1/2024

JXM

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

**UNITED STATES DISTRICT
COURT
FOR THE NORTHERN
DISTRICT OF ILLINOIS
EASTERN DIVISION**

Zhougui Hong,

Plaintiff,

v.

Case No. 23-cv-16216

**The Individuals, Partnerships, and
Unincorporated Associations Identified on
Schedule A,**

Defendants.

**DEFENDANT’S, SYNTEGO LTD, EMERGENCY MOTION TO
DISMISS CASE AND MEMORANDUM IN SUPPORT
THEREOF**

Defendant on Schedule A, Syntego Ltd (hereinafter referred to as “Syntego” or “Defendant”), hereby moves for an order dismissal of the case brought by the PLAINTIFF, Zhougui Hong, (hereinafter referred to as “Plaintiff”), on November 24, 2023 and states the grounds as follows:

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The Court entered a sealed temporary restraining order without notice against Syntego on November 24, 2023. Syntego never received any notice of the injunction hearing, nor were they given any opportunity to be heard. Syntego currently has funds frozen of more than \$30,000 dollars.

I now seek an emergency hearing to dismiss the case against Syntego.

Syntego have already provided a response to the plaintiff and has submitted a motion to dissolve.

The next hearing is not scheduled until April and this is intolerable for Syntego as the TRO was issued as a direct result of the plaintiff attorney deliberately and knowingly misleading the court and thus persuading the court to issue the TRO in contravention of rule 65.

As previously stated in my motion to dissolve and my reply to the plaintiff, Syntego are very easy to find online we have all our contact details clearly published on our website and are a UK based and UK registered company. We were established in 2002. It is entirely impossible to counterfeit a word or product you were selling for at least two years before the plaintiff.

The Plaintiffs attorney knew this and deliberately included Syntego in the list of defendants so that the court would issue the TRO. The only reason the plaintiff's attorney would have done this is to obtain the leverage he wanted to extort cash out of Syntego.

I use the word extort as that is exactly what this is, manipulating the court to obtain a TRO to then hold companies to ransom for cash, it is despicable that an attorney should be allowed to carry out this manipulation of the US court system.

The plaintiff attorney cannot claim "ignorance" as it is no defence in law, so the court must dismiss the case against Syntego.

It is unacceptable that Syntego should have their business held to ransom from November 2023 until at least April 2024.

Syntego are entirely innocent and are suffering irreparable harm as each day passes and must be awarded damages under rule 65.

I am not an attorney, and there for cannot speak in a slick manner, I do however believe every word to be entirely true and correct.

I am looking to the court to urgently repair the wrong that has been done to my company and to restore my faith in the US legal system.

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Dated: March 1st, 2024. Respectfully Submitted,

Elliott Isbitt
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TN218DB
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